

## **REMARKS**

With the foregoing amendment claims 1-25 and 29-36 are pending in the application. Claims 26-28 are cancelled. Claims 1, 4, 13, 14, 18, 20, 25, and 29 are independent. No new matter has been added by the above amendments. Applicants respectfully request reconsideration.

### **Claim Rejections Under 35 U.S.C. 102 and 103**

Claims 1-4, 6-21, 24-30, 33 and 36 stand rejected under 35 U.S.C. 102 as being anticipated by Sallette (US 6,155,840). Applicants respectfully traverse. Claims 5, 22-23, 31-32 and 34-35 stand rejected under 35 U.S.C. 104 as being anticipated by Sallette in view of Abrahamson (US 5,002,491). Applicants respectfully traverse.

#### **1. Claims 1-3**

With respect to claim 1, claim 1 is patentable over Sallette because Sallette does not disclose all of the features of claim 1. For example, at the least, Sallette does not disclose:

at least one instructor computer networked with said plurality of student computers, said instructor computer and said plurality of student computers being configured to enable an instructor command to be sent from said instructor computer to said student computers; wherein, said instructor command causes each student computer that receives the instructor command to (1) modify a sequence of course content, (2) access a specified file stored in said student computer, (3) run a specified computer program stored in said student computer, and/or (4) initiate communications with another student computer

as is recited in claim 1, as amended.

Sallette discloses a system for distributed learning. The system includes a presenter computer system 106A and one or more audience member computer systems 108A-C (see FIG. 1 of Sallette). The presenter computer system 106A and the audience member computer systems 108A-C are connected to a network 104. According to Sallette, the

presenter has “the ability to control the content that appears on the audience members’ computer systems.” Sallette, Col. 2, lines 45-47. Sallette further discloses that “the presenter computer system 106 is used by the presenter to communicate with audience members and control information that appears on the audience member computer systems 108.” Sallette, Col. 4, line 66 to Col. 5, line 2. With respect to the audience member computer system, Sallette discloses, “an audience member uses the audience member computer system 108 to receive the presentation from the presenter and communicate with the presenter and other audience members.” Sallette, Col. 5, lines 10-13.

However, Sallette does not disclose a system in which an instruction command can be sent from the instructor computer to one or more student computers, wherein the instruction command: (1) modifies a sequence of course content, (2) causes the student computer to access a specified file, (3) causes the student computer to run a specified computer program, and/or (4) causes the student computer to initiate and/or receive communications with other student computers.

Accordingly, Sallette does not disclose all of the features of claim 1. Abrahamson does not make up for the deficient teachings of Sallette. Therefore, Applicants respectfully request that the rejection of claims 1-3 be withdrawn.

## 2. Claims 4-12

With respect to claim 4, claim 4 is patentable over Sallette because Sallette does not disclose all of the features of claim 4. For example, as discussed above with respect to claim 1, Sallette does not disclose

[an] instructor command [that] causes each student device that receives the instructor command to (1) modify the pre-determined sequence of said course content, (2) access a specified file stored in said student computer, (3) run a specified computer program stored in said student computer, and/or (4) initiate communications with another student computer.

Accordingly, Sallette does not disclose all of the features of claim 4. Therefore, Applicants respectfully request that the rejection of claims 4-12 be withdrawn.

### 3. Claim 13

With respect to claim 13, claim 13 is patentable over Sallette because Sallette does not disclose all of the features of claim 13. For example, at the least, Sallette does not disclose “a training system, ... wherein, upon receipt of said instructor command, said student device modifies the course content stored in the student device based on said instructor command,” as is recited in claim 13. As discussed above with respect to claim 1, Sallette discloses that the presenter has “the ability to control the content that appears on the audience members’ computer systems.” Sallette, Col. 2, lines 45-47. However, Sallette does not disclose that the presenter transmits a command to a student device that causes the student device to modify course content stored in the computer device, which feature is required by claim 13. Accordingly, Sallette does not disclose all of the features of claim 13. Abrahamson does not make up for the deficient teachings of Sallette. Therefore, Applicants respectfully request that the rejection of claim 13 be withdrawn.

### 4. Claims 14-17

With respect to claim 14, claim 14 is patentable over Sallette because Sallette does not disclose all of the features of claim 14. For example, at the least, Sallette does not disclose “a multi-component training system, comprising: ... student computers being located in an on-site location and ... student computers being transported to a remote location distant to said on-site location, wherein said student computers in [the on-site location] and [the remote location] are used in different phases of student training,” as is recited in claim 14. The Office Action contends that Sallette discloses that “the student computers can be used in different phases of student learning.” However, the Office Action does not cite to any portion of Sallette that discloses this feature. The reason for this is that Sallette does not disclose that one set of student computers located in an on-site location and in communication with a central server are used in one phase of student learning, while another set of student computers located remotely from the on-site location, but also in communication with the central server, are used in a different phase of student learning. Accordingly, Sallette does not disclose all of the features of claim 14 and Abrahamson does

not make up for the deficient teachings of Sallette. Therefore, Applicants respectfully request that the rejection of claims 14-17 be withdrawn.

#### 5. Claims 18-19

With respect to claim 18, claim 18 is patentable over Sallette because Sallette does not disclose all of the features of claim 18. For example, at the least, Sallette does not disclose “a method for facilitating instructor training of students, comprising ... having said student communicate remotely with said instructor in substantially real time audio or video,” as is recited in claim 18 (emphasis added).

Sallette discloses that a video camera may be coupled to the student computer. See Sallette, col. 5, lines 20-22. However, the mere fact that a video camera is coupled to the student computer does not imply that the student communicates in real time with the instructor using the video camera. For all we know, the video camera is coupled to the student computer so that the student can create videos and then share the videos, in non-real time, with the instructor and/or other students in the class. In other words, Sallette does not disclose how the video camera is being used. Sallette merely states that the camera exists and is coupled to the student computer. There is simply no disclosure in Sallette that the student uses the video camera for real-time communication with the instructor. Accordingly, Sallette does not disclose all of the features of claim 18 and Abrahamson does not make up for the deficient teachings of Sallette. Therefore, Applicants respectfully request that the rejection of claims 18-19 be withdrawn.

#### 6. Claims 20-24

With respect to claim 20, claim 20 is patentable over Sallette because Sallette does not disclose all of the features of claim 20. For example, as discussed above with respect to claim 8, Sallette does not disclose “a method, comprising ... enabling the remote student to conduct a real-time communication with the instructor using a video camera coupled to the student computer,” as is recited in claim 20. Accordingly, Sallette does not disclose all of the features of claim 20 and Abrahamson does not make up for the deficient teachings of

Sallette. Therefore, Applicants respectfully request that the rejection of claims 20-24 be withdrawn.

7. Claim 25-28

With respect to claim 25, claim 25 is patentable over Sallette because Sallette does not disclose all of the features of claim 25. For example, at the least, Sallette does not disclose “a course training console ... wherein said console includes a plurality of monitors, including a first, second and third monitor, wherein the console is configured to display (a) reference material on the first monitor, (b) the output of a video camera for conferencing on the second monitor, and (c) shared text communications one the third monitor,” as is recited in claim 25. Sallette discloses a console having only a single monitor. Accordingly, Sallette does not disclose all of the features of claim 25 and Abrahamson does not make up for the deficient teachings of Sallette. Therefore, Applicants respectfully request that the rejection of claims 25-28 be withdrawn.

8. Claims 29-36

With respect to claim 29, claim 29 is patentable over Sallette because Sallette does not disclose all of the features of claim 29. For example, at the least, Sallette does not disclose “a training system, comprising: a first student computer ..., a second student computer ..., at least one instructor computer ..., said instructor computer being configured to enable a first instructor command to be sent from said instructor computer to only said first student computer and being configured to enable a second instructor command to be sent from said instructor computer to only said second student computer” as is recited in claim 29. As discussed above, Sallette discloses a system wherein a presenter can control the material that is displayed to the audience. However, nowhere does Sallette disclose that the presenter can send a first command to only a first audience member and a second command to only a second audience member. Accordingly, Sallette does not disclose all of the features of claim 29.

The Office Action asserts that Abrahamson discloses “an education system where an instructor may send instructor commands to only one student.” The Office Action further

asserts that it would have been obvious to modify the system described in Sallette to send commands to only one student, thereby providing instruction based on individual student progress. Applicants respectfully disagree.

There is no motivation or suggestion to modify Sallette so that the system described in Sallette can send an instructor command to only one student. The reason there is no motivation to modify Sallette in this manner is because Sallette is concerned with providing “a classroom or auditorium like metaphor” (col. 2, line 36). In a classroom or auditorium setting, the instructor or presenter does not teach one-on-one. Rather, the instructor or presenter provides a lesson or presentation to the entire class at the same time. Sallette further discloses that the system “can simultaneously support up to thousands of participants” (col. 2, line 15). Accordingly, it is clear that Sallette is not concerned with one-on-one teaching, but is concerned with a system that enables a presenter to present a lesson to a large number of students at the same time.


In short, there is no suggestion or motivation to modify Sallette because Sallette is not concerned with a one-on-one learning environment, but rather is concerned with providing a classroom or auditorium like metaphor. Moreover, if it is obvious to modify Sallette as the Office Action asserts, then why didn’t Sallette himself disclose this feature?

Applicants respectfully submit neither Sallette nor Abrahamson, considered alone or in combination, teach or suggest all features of claim 29. Thus, Applicants request that the rejection of claims 29-36 be withdrawn.

### **CONCLUSION**

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

RESPECTFULLY SUBMITTED,					
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